

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,
Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**AMBAC ASSURANCE CORPORATION'S INFORMATIVE MOTION REGARDING
THE USE OF DEMONSTRATIVES AT THE DISCLOSURE STATEMENT HEARING**

Ambac Assurance Corporation (“Ambac”), by and through its undersigned attorneys, hereby submits this informative motion and respectfully states as follows:

1. On July 2, 2021, the Court entered the *Order Regarding Procedures for Disclosure Statement Hearing* (ECF No. 17210) (the “Procedures Order”). Paragraph 8 of the Procedures Order instructs the parties to file an informative motion appending any exhibits and/or demonstratives on which they intend to rely at the July 13, 2021 hearing. (*See Procedures Order* ¶ 8.) Paragraph 8 further requires that the informative motion include an exhibit list indicating whether there are any known objections to the use of the exhibits or demonstratives. (*See id.*)

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19 BK5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

2. Pursuant to Paragraph 8 of the Procedures Order, the following demonstratives on which Ambac intends to rely at the July 13, 2021 hearing are attached hereto as **Exhibit A**:

No.	Description of Demonstrative
1	Chart setting forth Ambac's objections to the Board's proposed procedures and schedule for confirmation proceedings set forth in the Board's Confirmation Procedures Motion. ²
2	Chart illustrating differences between the Board's proposed plan confirmation schedule set forth in the Board's Confirmation Procedures Motion and Ambac and FGIC's proposed plan confirmation schedule set forth in Ambac and FGIC's Objection. ³
3	Chart comparing certain of Ambac's objections to the <i>Disclosure Statement for the Third Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.</i> (ECF No. 16741) with the Board's responsive modifications contained in the recently-filed <i>Disclosure Statement for the Fourth Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.</i> (ECF No. 17192).

3. Ambac is not presently aware of any objections to the use of these demonstratives. However, Ambac acknowledges that Paragraph 8 of the Procedures Order instructs that any objections to these demonstratives be filed by 9:00 p.m. (Atlantic Standard Time) on July 9, 2021. (See Procedures Order ¶ 8.)

4. Assuming no objections are filed, Ambac will ask the Court at the hearing to deem the demonstratives contained in Exhibit A entered into the record for purposes of the hearing.

WHEREFORE, Ambac respectfully requests that the Court take notice of the foregoing.

² "Confirmation Procedures Motion" refers to the *Motion of Debtors for an Order Establishing, Among Other Things, Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith* (ECF No. 16757).

³ "Ambac and FGIC's Objection" refers to the *Objection of Ambac Assurance Corporation and Financial Guaranty Insurance Company to the Board's Disclosure Statement Approval Motion and Confirmation Procedures Motion* (ECF No. 16998).

Dated: July 9, 2021
San Juan, Puerto Rico

FERRAIUOLI LLC

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CERTIFICATE OF SERVICE

I hereby certify that on this same date a true and exact copy of this notice was filed with the Clerk of Court using the CM/ECF system, which will notify a copy to counsel of record.

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